REVISION B

Processing SMA Variance Requests

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Date

DOCUMENT HISTORY LOG

Status (Draft/ Baseline/ Revision/ Canceled)	Document Revision	Effective Date	Description
Baseline		January 13, 2000	
Revision	A	April 14, 2000	Editorial corrections steps, 6.02, 6.06, 6.07, 6.14, 6.16, and 6.19; Modified Section 5 Flowchart and document retention in all Section 7.0 Quality Records.
	B	February 1, 2002	Added customer list, customer feedback to sections 5, 6.06, 6.07, 6.14, 6.16, and 6.21. Added new reference 4.2. Updated step 6.22 with the cancellation of HQOWI 1410-Q003.

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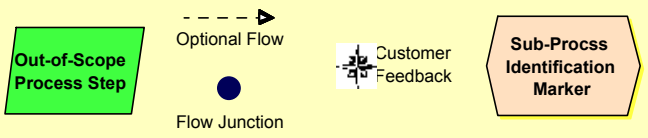
OSMA Staff Member Responsible for this HQOWI: QS/Jim Lloyd

Customers for this HQOWI: Internal: HQ Codes and AA/SMA
External: none

OSMA Flowcharting Symbology Used which is in addition to the symbology defined in HCP 1400-1: Document and Data Control



Note: For All OSMA intermediate and final outputs: page numbers, the date, and document owner will be marked on the document.

1. Purpose

The purpose of this Office of Safety and Mission Assurance (OSMA) Headquarters Office Work Instruction (HQOWI) is to identify the process for the review and approval/disapproval of Center or Enterprise requests for variances to NASA Safety and Mission Assurance (SMA) policies in NASA Policy Documents (NPD), NASA SMA procedures and guidelines in NASA Procedures and Guidelines (NPG), and NASA Safety Standards. This HQOWI does not describe the internal Center/Enterprise processes to flow data to OSMA. This HQOWI also specifies the Quality Records associated with the process.

2. Scope and Applicability

This OSMA HQOWI is applicable to all Center or Enterprise requests for variances per paragraph 1. All OSMA Staff members involved in processing the request will use this HQOWI.

3. Definitions

3.1. AA: Associate Administrator

3.2. AA/SMA: Associate Administrator for Safety and Mission Assurance

3.3. DASHO: The Designated Agency Safety and Health Official who assists the agency head in establishing and implementing a safety and health program consistent with OSHA requirements.

3.4. DD: Division Director

3.5. Deviation: A documented variance that authorizes departure from a particular safety requirement that does not strictly apply or where the intent of the requirement is being met through alternate means that provide an equivalent level of safety with no additional risk. The OSHA term for deviation is alternate or supplemental standard only when it applies to OSHA requirements.

3.6. Document Lead (DL): The OSMA Staff Member who is the lead for an SMA Document.

3.7. NPD: NASA Policy Document

3.8. NPG: NASA Procedures and Guidelines Document

3.9. NODIS: NASA On-Line Directives Information System

3.10. Regulatory Agency: The agency chartered by law and who is responsible for promulgating safety and health standards in a particular field of interest or subject matter(e.g. Department of Labor: safety and health; Food and Drug Administration: laser equipment; Department of Transportation: hazardous material transportation and packaging.)

3.11. Requestor: The Enterprise or Center that has submitted the safety variance to the OSMA for review and approval.

3.12. SMA: Safety and Mission Assurance

3.13. Variance: Documented and approved permission to perform some act contrary to established requirements.

3.14. Waiver: A variance that authorizes departure from a specific safety requirement where a special level of risk has been documented and accepted.

4. Reference Documents

The documents listed in this section are used as reference materials for performing the processes covered by the Quality Management System (QMS). Since all NASA Headquarters Level 1 (QMS Manual) and level 2 (Headquarters Common Processes) documents are applicable to the QMS, they need not be listed in this Section unless specifically referenced in this OSMA HQOWI.

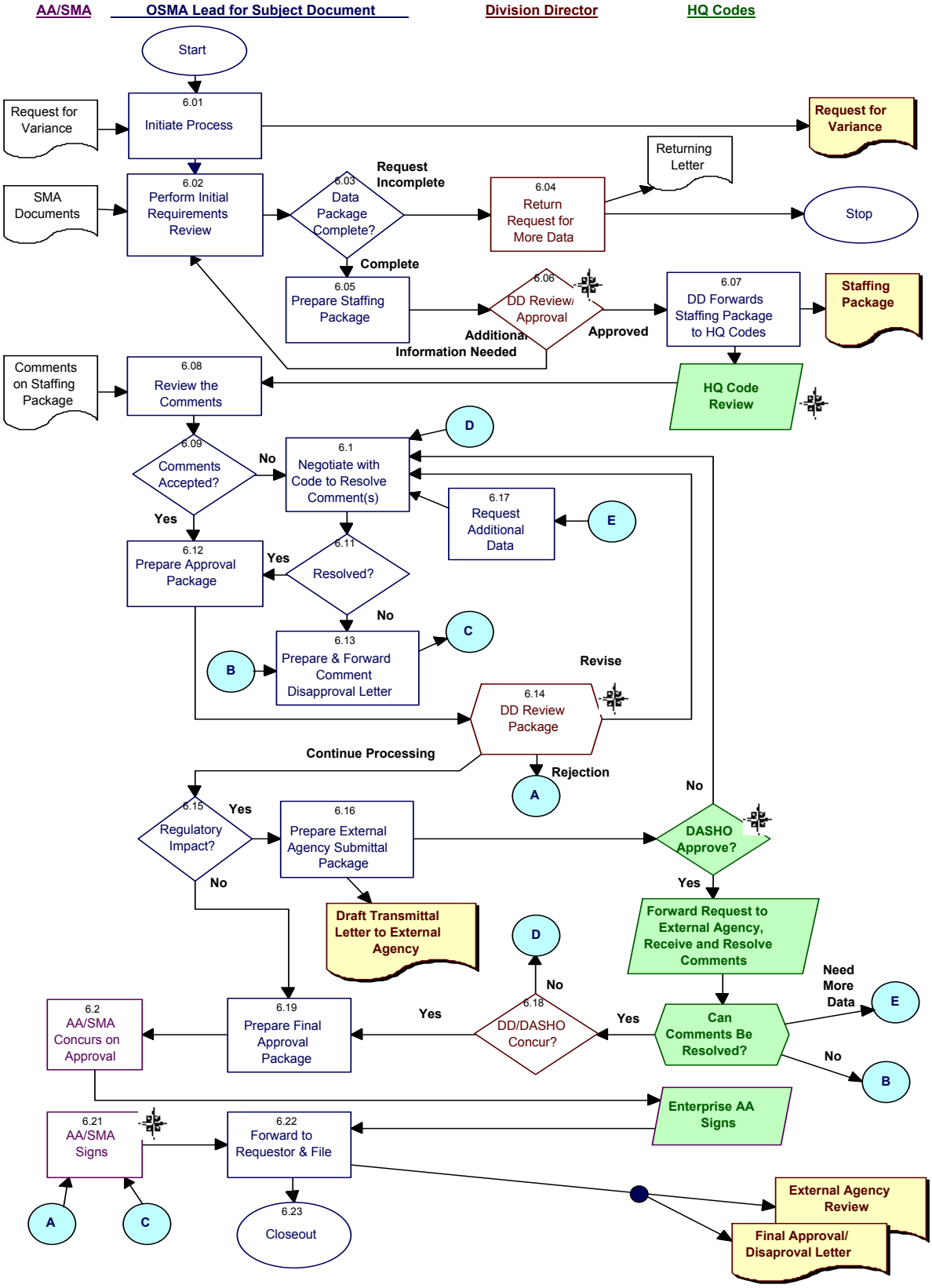
4.1. NPD 1400.1: NASA Directives System

4.2. NPD 8700.1: NASA Policy for Safety and Mission Success

4.3. NPG 8715.3: NASA Safety Manual

4.4. SMA Document Tree (See OSMA Homepage) at http://www.hq.nasa.gov/office/codeq/doctree/qdoc.pdf

5. Flowchart


AA/SMA
OSMA Lead for Subject Document
Division Director
HQ Codes
Start
Request for Variance
6.01 Initiate Process
Request for Variance
SMA Documents
6.02 Perform Initial Requirements Review
6.03 Data Package Complete?
Request Incomplete
6.04 Return Request for More Data
Returning Letter
Stop
Complete
6.05 Prepare Staffing Package
6.06 DD Review/ Approval
Additional Information Needed
Approved
6.07 DD Forwards Staffing Package to HQ Codes
Staffing Package
Comments on Staffing Package
6.08 Review the Comments
HQ Code Review
6.09 Comments Accepted?
No
Yes
D
6.1 Negotiate with Code to Resolve Comment(s)
6.17 Request Additional Data
E
6.11 Resolved?
Yes
No
6.12 Prepare Approval Package
B
6.13 Prepare & Forward Comment Disapproval Letter
C
Revise
6.14 DD Review Package
Continue Processing
Rejection
A
6.15 Regulatory Impact?
Yes
No
6.16 Prepare External Agency Submittal Package
Draft Transmittal Letter to External Agency
DASHO Approve?
No
Yes
Forward Request to External Agency, Receive and Resolve Comments
Need More Data
E
Can Comments Be Resolved?
Yes
No
B
6.18 DD/DASHO Concur?
No
D
Yes
6.19 Prepare Final Approval Package
6.2 AA/SMA Concurs on Approval
Enterprise AA Signs
6.21 AA/SMA Signs
6.22 Forward to Requestor & File
A
C
6.23 Closeout
External Agency Review
Final Approval/ Disaproval Letter

6. Procedure

6.01 OSMA Staff Member Initiate Process:

OSMA receives a request for a variance, waiver or deviation for a document (e.g.; NPD or NPG) which the OSMA controls. The OSMA Documentation Tree lists the documents that OSMA is responsible for, the document lead and cognizant division.

The request for variance is passed to the OSMA Document Lead for the document for review and processing. The request is filed as a Quality record.

6.02 Document Lead Perform Initial Requirements Review:

The Document Lead performs initial requirements review against NASA and OSMA policies and requirements to determine if NASA has jurisdiction or if a regulatory agency has jurisdiction for the requirement referenced in the request. This review is based on the Document Lead's knowledge of the subject and the history of the document and the hierarchy above the document.

Each request must contain supporting materials to justify the need for the request. How much supporting material will be different for each request and will be based on the complexity and risk associated with the requirement as determined by the expertise of the Document Lead. If the documentation supporting the request does not make a complete case for the request or is lacking supporting materials, the package is discussed with requestor for more details, rationale, information, etc.

6.03 Document Lead Data Package Complete?

If the data package is complete, (meaning that there is adequate justification to support the requested variance based on the Document Lead's professional experience), the data package is forwarded for staffing, if it can not be completed by the OSMA staff member, it is returned to the requestor for further development prior to resubmission. If the package is determined to be complete then go to step 6.05

6.04 Division Director Return Request for More Data:

Incomplete data packages are returned to the initiator for clarification and will require resubmission. If/when they are resubmitted then a new instance of the process will be opened. The process is then closed out.

6.05 Document Lead Prepare Staffing Package:

A data package is prepared sHQOWIng the request and rationale for the request along with a signature concurrence page. The Document Lead prepares a recommended response to the requestor. The package is forwarded to the Division Director (DD) for either the Safety and Risk Management Division or Enterprise Safety and Mission Assurance Division, whichever division controls the document. The staffing package includes the request for review by HQ Codes and NASA Centers as needed. NPD 1400.1 provides guidance on documentation review. As a part of the analysis, the it will be examined as to whether NASA has jurisdiction on the requirement or if an external agency has jurisdiction. The results of this review will be used in step 6.15.

6.06 DD DD Review/Approval?

Relying on professional judgment, the DD determines if the request is complete. The staffing package can either be:

1. approved and forwarded to other HQ Codes for review (step 6.07), or
2. approval is withheld and returned to Document Lead for more information (Step 6.03).

(Internal Customer Feedback).

6.07 DD DD Forwards Staffing Package to HQ Codes:

The staffing package is forwarded to HQ codes for review and comment. The forwarding letter and is filed as a Quality Record.

HQ Codes will provide comments back to OSMA based on their review. (Internal Customer Feedback).

6.08 Document Lead Review the Comments:

The returned comments are reviewed and each one is analyzed against OSMA policies and other NASA Policies and applicable laws (if necessary). A proposed response is made for each comment and entered into a comment matrix generated by the Document Lead. The Staffing package is filed as a Quality Record.

6.09 Document Lead Comments Accepted?

If all comments are accepted from all reviewers or a satisfactory compromise has been reached with the comment provider, then an approval package is prepared (Step 6.12). All comments not accepted are reviewed with the comment provider (Step 6.10).

6.10 Document Lead Negotiate with Code to Resolve Comment(s):

Discussions are conducted with the comment provider and the requestor to attempt to resolve all of the comments and concerns with the request. If there are unresolvable comments, then a package will be prepared to formally reject the request.

6.11 Document Lead Resolved?

If all comments were resolved, processing can continue with step 6.12. If comments could not be resolved then processing can not proceed to approval and goes to step 6.13 for disapproval.

6.12 Document Lead Prepare Approval Package:

An approval package is prepared per NPD 1400.1 guidelines for changing a document, containing the original request, matrix of review comments and disposition, supporting documentation and the draft change. Requests, which are not against NODIS stored documents, will follow the same general guidelines. The package is forwarded to the DD for their review.

6.13 Document Lead — Prepare and Forward Comment Disapproval Letter:

Since the comments were not able to be resolved, OSMA will be disapproving the original request. A letter stating the reason for the disapproval is prepared for the requestor informing them of the outcome. Go to Step 6.20.

6.14 DD — DD Review Package?

The DD will review the package and, based on his professional expertise, will determine the next processing step. If the process is accepted and the request is being forwarded for approval, then the processing continues. Incomplete packages are returned to the Document Lead for further work and/or resolution. Completeness is measured as being complete and logically prepared per NPD 8700.1 and NPD 1400.1 guidance. (Internal Customer Feedback).

6.15 Document Lead — Regulatory Impact?

The request is reviewed to see if an external regulatory jurisdiction must review the request prior to final approval? Determination is based on the document history, stated references in the affected document and the Document Lead's knowledge of the subject material.

6.16 Document Lead — Prepare External Agency Submittal Package:

The request to the regulatory agency is prepared. For all external requests the Designated Agency Health and Safety Official (DASHO) will officially transmit the request. The Draft Transmittal Letter is filed as a Quality Record.

The regulatory agency will respond to the request. If the answer is that the regulatory agency concurs, then the processing of the request continues. If it was not approved then a disapproval letter is prepared for the AA/SMA signature with an explanation for disapproval. If the regulatory agency returns the request without a decision, then the request is returned to the Document Lead in step 6.17 for resolution. (Internal Customer Feedback).

6.17 Document Lead — Request Additional Data

The DL reviews the prior analyses done on the request and contacts the requestor to determine the answer to the issue raised by the External Agency. Then processing continues with Step 6.10.

6.18 DD with the DASHO — DD/DASHO Concur?

The DD and the DASHO review the response from the regulatory agency. If the DD and the DASHO agree that the processing should continue then final processing is begun. If not, the process returns to step 6.11.

6.19 Document Lead — Prepare Final Approval Package:

An Approval Package is prepared for the request and routed to the AA/SMA for signature. In addition, the letter approving the request for variance/waiver/deviation states exactly which requirements may be modified, for how long the modification is effective, and who may use the modified requirement. The package should contain a history of the reviews and a historical file of all review comments.

6.20 AA/SMA AA/SMA Concurs on the Approval:

The AA/SMA signs the approval letter as concurrence and forwards the letter to the Enterprise AA responsible for the program and or center making the request for approval.

By the Enterprise AA signature, the enterprise is accepting the risk associated with the variance and is agreeing to put alternate safety precautions in place per the variance.

6.21 AA/SMA AA/SMA signs:

The AA/SMA signs the disapproval and rejection letters and forwards it to the requestor. (Internal Customer Feedback).

6.22 Document Lead Forward to Requestor and File:

The original approval letter is sent to the requestor, the Final Approval/Disapproval Letter, Regulatory Agency Review (if applicable) and the updated document are filed as quality records and if appropriate, the OSMA Document Tree will be updated. Completion of the variance is an input which begins HQOWI 1410-Q002.

6.23 Document Lead Closeout:

When all items have been closed on the request, the process is closedout.

7. Quality Records

Record ID	Owner	Location	Media Electronic /hardcopy	Schedule Number & Item Number	Retention & Disposition
Request for Variance	Document Lead	Official files	Hardcopy	Schedule: 1 Item: 72.A	Retire to FRC 1 year after document or variance is superceded, canceled or withdrawn then transfer to NARA when 20 years old
Staffing Package (with comments and recommended response)	Document Lead	Official files	Hardcopy	Schedule: 1 Item: 72.A	Retire to FRC 1 year after document or variance is superceded, canceled or withdrawn then transfer to NARA when 20 years old

Record ID	Owner	Location	Media Electronic /hardcopy	Schedule Number & Item Number	Retention & Disposition
Draft Transmittal letter to External Agency *NOTE: DASHO keeps original Transmittal Letter	Document Lead	Official files	Hardcopy	Schedule: 1 Item: 24	Keep until letter forwarded to reviewing agency then destroy
External Agency Review	Document Lead	Official files	Hardcopy	Schedule: 1 Item: 120.E	Retain 1 year after variance is superceded or becomes obsolete then destroy
Final Approval/ Disapproval letter	OSMA Corres Control	OSMA Chron File	Hardcopy	Schedule: 1 Item: 22	Retire to FRC when 5 years old in 5 year blocks, then retire to NARA when 10 years old